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12 Attorneys for Defendant
LIBERTY LIFE ASSURANCE COMPANY
13 OF BOSTON

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 TERREL HOFFMAN,) Case No. C08 00301 JF
18 Plaintiff,)
19 vs.) STIPULATION AND (PROPOSED) ORDER
20 LIBERTY LIFE ASSURANCE COMPANY) DISMISSING DEFENDANT SYNOPSYS, INC.
OF BOSTON; SYNOPSYS, INC.) LONG TERM DISABILITY PLAN
LONG TERM DISABILITY PLAN,)
22 Defendants.)
23)
24)

25 Plaintiff TERREL HOFFMAN and Defendant LIBERTY LIFE ASSURANCE
26 COMPANY OF BOSTON ("Liberty Life") hereby stipulate as follows:
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1 WHEREAS, Plaintiff has filed her Complaint in this action seeking recovery of Long-Term
2 Disability Benefits from Liberty Life and Defendant Synopsys, Inc. Long Term Disability Plan
3 ("the Plan");

4 WHEREAS, Liberty Life has filed an Answer denying liability in this action;

5 WHEREAS, notwithstanding its denial of liability, Defendant Liberty Life stipulates and
6 agrees that it will be liable for any judgment concerning payment or non-payment of Long-Term
7 Disability Benefits, interest, attorney's fees and/or costs that may result from this action, both
8 individually and as if it were the Plan;

9 WHEREAS, Liberty Life further agrees that at no time during the course of this litigation
10 will it contend that the action has been rendered defective as the result of the Plan having been
11 dismissed from this action;

12 THEREFORE, IT IS HEREBY STIPULATED, by and between the parties through their
13 respective counsel, that Defendant Synopsis, Inc. Long Term Disability Plan may be dismissed
14 from this action.

15 Dated: May 8, 2008

FLYNN, ROSE & PERKINS

16 By _____ /s/ Charles B. Perkins _____
17 CHARLES B. PERKINS
18 Attorney for Plaintiff
19 TERREL HOFFMAN

20 Dated: May 8, 2008

21 ROPERS, MAJESKI, KOHN & BENTLEY

22 By _____ /s/ Jennifer A. Williams _____
23 PAMELA E. COGAN
24 KATHRYN C. CURRY
25 JENNIFER A. WILLIAMS
26 Attorneys for Defendant
27 LIBERTY LIFE ASSURANCE
28 COMPANY OF BOSTON

1
2 ORDER
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4 Pursuant to stipulation, it is hereby ordered that Defendant Synopsis, Inc. Long-Term
5 Disability Plan is dismissed from this action.
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7 IT IS SO ORDERED.
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9 Dated: May _____, 2008
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11 _____
12 THE HONORABLE JEREMY D. FOGEL
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